

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22787-SCOLA/GOODMAN

LIORA SAMANDAROVA,

Plaintiff,

vs.

HOOCAH EXOTIX LLC, JEAN-  
CHRISTOPHE PITTMAN, AND  
ALEXANDRE ARKHIPOV,

Defendants.

\_\_\_\_\_ /

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME  
TO FILE HER MOTION FOR DEFAULT FINAL JUDGMENT**

Plaintiff, Liora Samandarova, through her undersigned counsel and pursuant to Fed. R. Civ. P. 12, Local Rule 7.1, and other applicable Rules and laws, request the Court to grant an extension of time to file her Motion for Default Judgment based the following good cause:

1. The Court entered its Order on January 24, 2023, requiring that Plaintiff file her Motion for Default Judgment on or before February 7, 2023.
2. On that same day, the Honorable Beth Bloom scheduled the undersigned counsel for trial commencing on January 30, 2023.
3. The undersigned law firm thereafter focused on preparing for the trial of an FMLA case in *Monzon Cejas v. Downrite Engineering Corp.*, 1:21-CV-23556-BLOOM, for the remainder of the week and into the weekend.
4. The jury returned its verdict in the *Monzon Cejas* case on the afternoon of January 31, 2023.

5. Due to the press of business and commitments in other matters, the undersigned could not obtain and prepare the necessary documentation to file its Motion for Default Judgment by February 7, 2023.

6. Pursuant to Fed. R. Civ. P. 6(b)(1) “When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.”

7. This Court has the power to “control the disposition of the causes on its docket with economy of time and effort for itself, for counsel and for litigants.” *Landis v. North American Co.*, 299 U.S. 248, 254 (1936); *also see Clinton v. Jones*, 520 U.S. 681, 706-707 (1997).

8. Accordingly, Plaintiff respectfully requests the Court to grant her a two-week extension of time through February 21, 2021, to file her Motion for Default Judgment.

WHEREFORE Plaintiff, Liora Samandarova, respectfully request the Court to grant her the Extension of Time requested above.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 7<sup>th</sup> day of February 2023 through filing in CM/ECF, and by email on Defendant, Alexandre Arkhipov, *pro se*, by email at [bonamicoalex@gmail.com](mailto:bonamicoalex@gmail.com), 8028 N.W. 11th Ave., A, Miami, FL 33150.

Brian H. Pollock, Esq.  
Brian H. Pollock, Esq.  
Fla. Bar No. 174742  
[brian@fairlawattorney.com](mailto:brian@fairlawattorney.com)  
FAIRLAW FIRM  
135 San Lorenzo Avenue  
Suite 770  
Coral Gables, FL 33146  
Tel: 305.230.4884  
*Counsel for Plaintiff*